

# Site Evaluations Using The Low Threat Closure Policy

And How San Diego County  
Will be Implementing It

by

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# The Policy

- The Low-Threat Underground Storage Tank Case Closure Policy (LTCP) -

The purpose of this policy is to establish consistent statewide case closure criteria for low-threat petroleum UST sites.

# The Resolution

- State Water Resources Control Board Resolution 2012-0016 –  
Reviews of each UST case shall be performed within 365 days from the effective date of the Policy which shall include:

# The Resolution

- a. Determination of whether or not each UST case meets the criteria in the Policy or is otherwise appropriate for closure based on a site-specific analysis.

# The Resolution

- b. If the case does not satisfy the criteria in this Policy or does not present a low-risk based upon a site-specific analysis, impediments to closure shall be identified.

# The Resolution

- c. Each case review shall be made publicly available on the State Water Board's GeoTracker web site in a format acceptable to the Executive Director.

# The Eligible Sites

In order for a site to be a candidate for closure under the LTCP, ALL of the following criteria must be satisfied:

# The Eligible Sites

- a) The unauthorized release is located within the service area of a public water system

(San Diego County Water Authority and State-regulated water systems)



# The Eligible Sites

- b) The unauthorized release consists only of petroleum;
- c) The unauthorized (“primary”) release from the UST system has been stopped;

# The Eligible Sites

- d) Free product has been removed to the maximum extent practicable;

# The Eligible Sites

- e) A conceptual site model that assesses the nature, extent, and mobility of the release has been developed. Specifically:

# The Eligible Sites

1. Assessment of the release has been completed, and
2. The consultant has prepared a comprehensive conceptual site model

# The Eligible Sites

3. If these actions have not been completed, the case isn't ready for closure.

# The Eligible Sites

- f) Secondary source has been removed to the extent practicable;

# The Eligible Sites

- g) Soil or groundwater has been tested for methyl tert-butyl ether (MTBE) and results reported in accordance with Health and Safety Code section 25296.15; and

# The Eligible Sites

- h) Nuisance as defined by Water Code section 13050 does not exist at the site.



# Example Using Beta Test Site on Geotracker

- [Geotracker Regulator Sign-in Page](#)

# Few SAM Sites Eligible

- Most are still in the assessment phase
- If they met the criteria, we would be closing them anyway
- The biggest policy change relates to the vapor risk at existing fueling facilities

# SAM Site Reviews

- The Geotracker Low Threat Closure Policy Checklist should be completed when the next monitoring or assessment report is received
- According to the policy, this evaluation will need to be done annually